

EDWARD J. TAYLOR, JR.

DOCKET FILE COPY ORIGINAL

July 20, 1994

14310 Fox Fire Lane
San Antonio, Texas 78231
Home: (512) 493-9815

The Honorable Andrew Barrett
Federal Communications Commission
1919 M Street NW
Washington DC 20554

RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Dear Representative Barrett:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for O+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

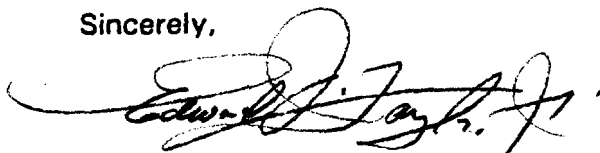
Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,



No. of Copies rec'd 1
List ABCDE

SHERIFF AND CORONER



COUNTY OF SANTA CRUZ

ALFRED F. NOREN
SHERIFF-CORONER

701 OCEAN ST., RM. 340
SANTA CRUZ, CALIFORNIA 95060
PHONE (408) ~~425-2035~~ 454-2964
IN REPLY PLEASE REFER
TO OUR FILE _____

DOCKET FILE COPY ORIGINAL

July 22, 1994

RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

The Honorable Andrew C. Barrett
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

Dear Mr. Barrett:

As Sheriff-Coroner of Santa Cruz County and responsible for administering the local jail system, I am asking that the Federal Communications Commission exclude local jails from the proposed Billed Party Preference System.

Prior to the emergence of inmate phone service, we had a continuing problem with telephone fraud and inmates calling their victims and in some cases judges. Local jails cannot afford a sophisticated phone system with the ability to monitor phone calls and prevent such untoward activity without inmate phone service providers.

While I understand the Commission's desire to mitigate costs for this country's citizenry, the number of calls relating to jails is small by comparison to other phone systems the Commission is concerned with. Having victims and witnesses free from intimidation and harassment is certainly of paramount importance to the citizens.

While the cost to inmate and family may exceed that of normal calls, one must take into account the fact that inmates are in custody by reason of our justice system and their own actions. Some are pre-trial, many are serving sentences, and the very actions that brought them into custody invite a loss of some privileges.

Another issue is one of economics for correctional providers. We receive a portion of the costs charged for inmate phone calls and by state law these monies are restricted solely for the benefit of the inmates. These funds don't come directly from the taxpayer yet they provide Friends Outside, commissary benefits, and a variety of vocational and academic programs to hopefully preclude inmates' re-entry into the criminal justice system.

Additionally, if the present jail phone providers are eliminated by the Commission's action, that action will in effect reduce the communications ability of the individual inmates. I truly believe that inmate phone systems should be excluded from the Billed Party Preference program and ask that your Commission seriously consider such exclusion.

No. of Copies rec'd _____
List ABCDE _____

Sincerely,

Alfred F. Noren
ALFRED F. NOREN, Sheriff-Coroner

"Cleveland County
Grows Greater"



"Cleveland County
Sheriff's Department"

DOCKET FILE COPY ORIGINAL

P. O. BOX 1508 SHELBY, NORTH CAROLINA 28150

BUDDY R. McKINNEY
SHERIFF

RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

July 27, 1994

The Honorable Andrew C. Barrett
Federal Communications Commission
1919 M. Street, NW
Washington, D.C. 20554

Re: CC Docket No 92-77 Opposition to Billed Party Preference

Dear Commissioner Barrett:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few will be trained to handle inmate calls.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. The equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

Furthermore, we are sensitive to the rates inmates families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The

No. of Copies rec'd 1
List ABCDE

Page 2

proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we found to be necessary at our facility, ultimately reducing phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions -- decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Max E. Blanton".

Max E. Blanton, Chief Jailer
Cleveland County Jail
100 Justice Place, Shelby, NC 28150

MEB/pbs



Correctional Facility

297 South Century Avenue
St. Paul, MN 55119

DOCKET FILE COPY ORIGINAL

RECEIVED

Tel: 612-298-5562

Fax: 612-298-5432

July 26, 1994

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RE: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Chairman Hundt:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Our current contract with AT&T/Tele-matic has almost eliminated the harassing and threatening calls by inmates. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment with the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some facilities do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more

No. of Copies rec'd
List ABCDE

Minnesota's First Home Rule County

printed on recycled paper with a minimum of 10% post-consumer content

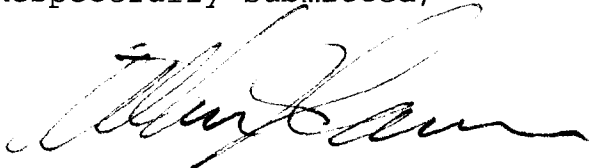


The Honorable Reed E. Hundt, Chairman
RE: CC Docket No. 92-77 Opposition to Billed Party Reference
Page Two

effective action would be to adopt rate ceilings on inmate calls and then let Correctional Officials/Sheriff's enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Corrections Officials/Sheriff's are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions -- decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Arthur J. Cavara', with a stylized, flowing script.

Arthur J. Cavara
Superintendent

cc: Honorable James H. Quelle
Honorable Rachelle B. Chong
Honorable Andrew C. Barrett
Honorable Susan Ness

DOCKET FILE COPY ORIGINAL

RECEIVED

July 25, 1994

AUG 1 1994

The Honorable Andrew C. Barrett
Federal Communications Commission
1919 M Street NW Room 222
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: CC Docket No 92-77 Opposition to Billed Party Preference

Dear Mr. Barrett:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed the phone needs for our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls. We cannot allow inmates to have open access to telecommunications network. We contract with a phone carrier that we can trust and who knows how to handle inmate calls to reduce harassment, verbal abuse, fraud etc.

Inmate phone systems can block numbers to police officers, judges, attorneys, victims, etc, that do not want to be harassed by inmates. If the BPP is approved, who will handle these problems and who will pay the price to prevent such problems? Budgets for all Sheriffs Offices are limited so it would be impossible for us to pay for any type of phone system. At the present time our phone carrier pays for all repairs and all phone replacements at no cost to us, we can not afford to give up such a system.

Also money received from inmate phone calls pays for cable T.V, books, GED classes, AA-NA classes, things that otherwise would no happen. Again who will pay the price for such programs? Please stop the BPP, there must be another way.

Lt R.A. Brinkley A.C.C.O
Warren Co Jail
Warren Co Sheriffs Office

No. of Copies rec'd 1
List ABCDE

DOCKET FILE COPY ORIGINAL

Dave Bleser
9235 Tifton
San Antonio, TX 78240

July 20, 1994

RECEIVED

AUG 1 1994

The Honorable Andrew Barrett
Federal Communications Commission
1919 M Street NW
Washington DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Dear Representative Barrett:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for 0+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

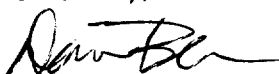
Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,



No. of Copies rec'd _____
List ABCDE _____

DOCKET FILE COPY ORIGINAL

JAMIE SALAS
826 Alameda
SAN ANTONIO, TX 78212

July 20, 1994

The Honorable Andrew Barrett
Federal Communications Commission
1919 M Street NW
Washington DC 20554

RECEIVED

AUG 1 1994

Dear Representative Barrett:

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for 0+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,

Jamie Salas

No. of Copies rec'd 1
List ABCDE

SEVIER COUNTY SHERIFF'S DEPARTMENT
SEVIER COUNTY JAIL
LT. KERRY MEACHAM

DOCKET FILE COPY ORIGINAL

250 NORTH MAIN
RICHFIELD, UTAH 84701

PHONE (801) 896-6433
FAX (801) 896-6081

JULY 11, 1994

RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

VINCENT TOWNSEND
APCC INMATE PHONE SERVICE TASK FORCE
P.O. BOX 8179
GREENSBORO, NC. 27419

DEAR MR. TOWNSEND

I HAVE REVIEWED THE PROPOSED BILLING PARTY PREFERENCE ACT CONCERNING INMATE TELEPHONE SYSTEMS AND FIND THAT I AM NOT IN FAVOR OF THIS ACTION. I DO NOT BELIEVE THAT ANYONE WOULD BE SERVED OR RECEIVE ANY KIND OF BENEFIT FROM THIS ACTION. IT APPEARS TO ME THAT IT WOULD COST TOO MUCH TO IMPLEMENT AND WOULD END UP COSTING MORE MONEY FOR INMATE PHONE CALLS TO THEIR FAMILIES, AS THE COSTS WOULD BE PASTED ON TO THE CUSTOMERS. IT IS CLEAR THAT IF IT BECOMES TOO EXPENSIVE FOR INMATES AND THEIR FAMILIES, THEY WOULD COMPLAIN TO THE POINT THAT IT WOULD BE MORE BENEFICIAL FOR THE JAILS AND PRISONS TO TAKE OUT THE PHONES INSTEAD OF DEALING WITH THEM, RESULTING IN EXTENSIVE LOST CONTACT BETWEEN INMATE AND FAMILY.

SINCERELY,



KERRY MEACHAM
JAIL COMMANDER

No. of Copies rec'd 1
List ABCDE



County of Yolo Sheriff - Coroner

41793 Gibson Road, Woodland, CA 95776

CC# 92-77

DOCKET FILE COPY ORIGINAL

Bob Martinez,
Sheriff-Coroner

Bart Simpson,
Assistant Sheriff-Coroner

JULY 19, 1994

THE HONORABLE REED E. HUNDT, CHAIRMAN
FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET, N.W.
WASHINGTON, D.C. 20554

REGARDING: BILLED PARTY PREFERENCE

Dear Honorable Hundt:

The Yolo County Sheriff's Department in California is a small to medium agency with a detention facility housing up to 410 inmates. Like most counties in California, we have faced severe budget impacts requiring staff and program reductions and exceptionally smart fiscal spending. If the FCC imposes "**Billed Party Preference**" our inmate programs will become non-existent due to lack of funding now received from inmate telephone use. The Inmate Welfare Fund receives revenue from commissary programs and inmate telephone usage. The fund provides the following services to incarcerated males and females which will end with BPP passage:

||- Inmate Literacy programs provides tutors to illiterate and inmates with poor reading skills. Our goal is to develop reading skills and instill confidence in the inmate to better prepare them for the job market and break the recidivism rate cycle.

||- A computer education lab will teach the inmate life skills and prepare the student from grade 1, if necessary, to satisfactory completion of the GED.

||- A Parenting Class instructor educates the inmates on how to be a responsible parent and deal with the everyday responsibility of parenting after release.

||- Services by "Friends Outside", a non-profit organization assists inmates with their family and personal needs on the outside. This most valuable assistance will be eliminated without the continued revenue.

In addition to the loss of the aforementioned programs, items such as televisions, craft materials, exercise equipment and game boards which help the inmate cope with the stress of incarceration will be eliminated. All of these items are funded by the Inmate Welfare Fund. Also from this fund, indigent care and clothing for released inmates will be non-existent without continuing revenue levels.

The best safeguard currently to avoid overcharging of telephone rates is to continue with the responsible detention agency monitoring the rate structure charged. Fraud, harassment and three-way calling will not be controlled with the enactment of BPP and officer and inmate safety will be at risk.

No. of Copies rec'd _____
List ABCDE _____

RECEIVED
AUG 1 1994
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

The current regulations are working. Please do not change them and risk lives, detention security and valuable programs.

Sincerely,

BOB MARTINEZ
SHERIFF/CORONER



Tom O. Musgrove, Captain
Detention Commander

copies to: The Honorable James H. Quello
 The Honorable Andrew C. Barrett
 The Honorable Rachelle B. Chong
 The Honorable Susan Ness

No. of Copies rec'd _____
List ABCDE



County of Tulare

OFFICE OF
Butch Coley, Sheriff-Coroner

County Civic Center, Visalia, California 93291
Telephone (209) 733-6218



July 22, 1994

COPY

RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Honorable Reed E. Hundt
Federal Communications Commission
1919 M Street, NW
Washington DC 20554

Re: Billed Party Preference; CC Docket #92-77

Dear Commissioner Hundt:

I am the Chief of Detentions for the Tulare County Sheriff's Department. My request is that the Federal Communications Commission exclude local jails from the proposed "Billed Party Preference" system for O+ Inter Lata pay phone traffic rules.

The BPP Plan does not take into account the day-to-day problems that arise in a local jail system. Most recently the mother of a female juvenile contacted me to complain of harassing phone calls her daughter was receiving from a local inmate. With the assistance of our local phone provider, I was able to immediately block further calls. We will no longer be able to provide this valuable service if the BPP Plan is adopted. Inmates would be free to threaten and harass whoever they please.

The BPP Plan will eliminate the current revenue-sharing programs that fund inmate education and other important programs. Without this revenue the programs will be cut or the local taxpayers will be required to shoulder an even bigger burden. The taxpayers I've talked to believe the inmate population should pay for as much of their incarceration expense as possible.

I am not insensitive to the rates that inmates and their families pay. I believe they should be reasonable as do most jail administrators. This is addressed during contract negotiations with the provider.

No. of Copies rec'd _____
List ABCDE _____

Hon. R. Hundt

-2-

July 22, 1994

Re: BPP

My staff and I are responsible for the management, control, and welfare of the inmate population in this county. We answer to the local voters for any decision we make. By not excluding local jails from the BPP Plan you are taking over a function that can be best dealt with by the local jail administration.

I am asking that you seriously consider excluding local jails from the BPP Plan.

Sincerely,

Chief J. Perryman

cc: Honorable James H. Quello
Honorable Andrew C. Barrett ✓
Honorable Rachelle B. Chong
Honorable Susan Ness

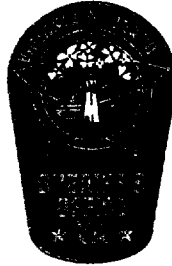
hundt.lm

VIRGINIA BEACH SHERIFF'S OFFICE

DOCKET FILE COPY ORIGINAL

FRANK DREW
Sheriff

JOSEPH P. VITALE
Undersheriff



2501 JAMES MADISON BLVD.
P. O. BOX 6098
VIRGINIA BEACH, VA 23456-9073
PHONE (804) 427-4555
FAX (804) 427-2606

July 22, 1994

RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

The Honorable Reed E. Hundt
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Billed Party Preference; CC Docket No. 92-77

Dear Mr. Hundt:

I would like to take this opportunity to voice my opposition to Billed Party Preference (BPP) for inmate telephones. BPP will eliminate all inmate phone service commissions and the fraud control features currently provided by our inmate phone service. The mere thought that as a jail administrator, I would not be able to control how inmate calls are routed, is appalling. The thought that an inmate could harass judges, witnesses, jury members or victims is an atrocity.

In the Virginia Beach Correctional Center, I have on site maintenance assigned to keep the inmate telephones in operating condition at all times. This prevents the delay of inmates making their telephone calls to family members, clergy, attorneys or friends. We have no down time on this service to our inmates, a statement I am sure I would not be able to make if service was as proposed by BPP. I oppose any federal interference with a Sheriff's ability to manage and control the inmates' calling.

In these days of budget cut-backs and financial constraints, it would be impossible for me to operate this facility as it is currently being operated, without funds generated by the inmate phone system. Recreation equipment, library books, educational and religious programs would also suffer. The revenue-sharing arrangements with our inmate phone provider have been an innovative

No. of Copies rec'd _____
List ABCDE _____

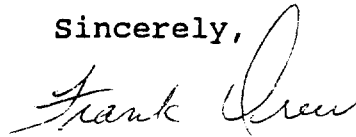
and effective means of financing important inmate needs. At a time of fiscal crisis in government, the FCC should not be cutting off a critical source of revenue that is used to benefit the inmates of this facility.

The rates provided by my inmate phone provider are reasonable. No complaints have been received in regard to the fees associated with our current system.

In closing, I believe that the responsibility for ensuring that the provider charges reasonable rates lies with facility administrators, who are in the best position to evaluate the circumstances of particular facilities. I have never known of a case where a problem was solved by adding another level of bureaucracy.

Thank you for your consideration and I would gladly show you through a facility where the present inmate telephone system works for the inmates.

Sincerely,

A handwritten signature in cursive script, appearing to read "Frank Drew".

Frank Drew

CC: The Honorable James H. Quello
The Honorable Andrew C. Barrett ✓
The Honorable Rachelle B. Chong
The Honorable Susan Ness
The Honorable Charles R. Robb
The Honorable Owen Pickett
Mr. John Jones
The Honorable James Dunning

DOCKET FILE COPY ORIGINAL

July 20, 1994

RECEIVED

AUG 1 1994

The Honorable Andrew Barrett
Federal Communications Commission
1919 M Street NW
Washington DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Dear Representative Barrett:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for O+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,



No. of Copies rec'd _____
List ABCDE _____

PATSY B. FARIAS
610 E. ASHLEY RD.
SAN ANTONIO, TX
78221

RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

July 20, 1994

The Honorable Andrew Barrett
Federal Communications Commission
1919 M Street NW
Washington DC 20554

DOCKET FILE COPY ORIGINAL

Dear Representative Barrett:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for 0+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,

Patsy B. Farias

No. of Copies rec'd 1
List ABCDE

DOCKET FILE COPY ORIGINAL

July 20, 1994

RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

The Honorable Andrew Barrett
Federal Communications Commission
1919 M Street NW
Washington DC 20554

Dear Representative Barrett:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for O+ Calis. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.


Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,


Jo Ana Alvarado

No. of Copies rec'd
List ABCDE

1

DOCKET FILE COPY ORIGINAL

Mary R. Guzman
4411 Callaghan Rd #911
San Antonio, Tx 78228

July 20, 1994

RECEIVED

The Honorable Andrew Barrett
Federal Communications Commission
1919 M Street NW
Washington DC 20554

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Dear Representative Barrett:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for 0+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,



No. of Copies rec'd _____
List ABCDE

DOCKET FILE COPY ORIGINAL

Sally Wlge
10951 Laureate Dr. #1908
San Antonio, TX 78249

July 20, 1994

RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

The Honorable Andrew Barrett
Federal Communications Commission
1919 M Street NW
Washington DC 20554

Dear Representative Barrett:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for 0+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,

Sally Wlge

No. of Copies rec'd _____
List ABCDE _____

DOCKET FILE COPY ORIGINAL

DORA Rymer
150 Prosperity
San Antonio, Tx
78237

July 20, 1994

RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

The Honorable Andrew Barrett
Federal Communications Commission
1919 M Street NW
Washington DC 20554

Dear Representative Barrett:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for 0+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,

No. of Copies rec'd _____
List ABCDE _____

DORA Rymer



DOCKET FILE COPY ORIGINAL

STATE OF MISSISSIPPI
DEPARTMENT OF CORRECTIONS
EDDIE LUCAS
COMMISSIONER

RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

22 July 1994

The Honorable Reed E. Hundt
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Billed Party Preference; CC Docket No. 92-77

Chairman Hundt:

As the Commissioner of the Mississippi Department of Corrections, I feel it is necessary to express my objections to the enactment of Billed Party Preference. Outlined below are our main areas of concern.

- BPP would undermine security and control of inmate calls.
There would be no restriction on where inmates could call. Inmates could plan escapes, run scams and conduct criminal operations with no way for the Department of Corrections to track calls or have record of such activity. Judges, witnesses, juries and victims would be open to threats and harassment from inmates and the harassed party would have to pay for the call. The Mississippi Department of Corrections has, in the past, had a national-wide problem with inmate money order scams. By working with our phone service provider and exercising control of inmate calling, the Mississippi Department of Corrections has been able to greatly curtail these fraudulent activities. BPP would eliminate all progress in this area and would escalate call abuse and criminal fraud activity.
- BPP would eliminate revenue sharing.
Currently all monies from inmate phone calls go into the Inmate Welfare Fund. These funds are used solely for the benefit of inmates incarcerated in the Mississippi Department

No. of Copies rec'd _____
List ABCDE

Honorable Reed E. Hundt
22 July 1994
Page -2-

of Corrections. Elimination of this revenue would cause a financial burden to the Department of Corrections and the taxpayers in the State of Mississippi. If BPP is enacted, the equipment currently provided by inmate telephone vendors would have to be purchased by the Department of Corrections with institutional funds at tremendous costs. The Mississippi Department of Corrections would have to provide phone lines and equipment at additional monthly costs. These additional financial burdens would be a severe blow to the State of Mississippi and the taxpayers during this time of nationwide fiscal crisis in government.

- BPP would eliminate ability to negotiate rates.

The ability to ensure reasonable rates for inmate telephone calls would be taken away from the Department of Corrections. We are very concerned about the financial burden that would be placed on the inmate family. With BPP the rates paid by inmate families would be set by the CEO's of the long distance carriers and the Department of Corrections would no longer be able to negotiate reasonable ceilings for inmate telephone rates. Without reasonable and sensible calling rates, the families of the inmates will not accept the inmate's calls.

In conclusion, for the Department of Corrections to provide telephone service for inmates equal to current service, the costs would be prohibitive if BPP is enacted. Our only alternative would be to reduce inmate telephone service to a level that would be affordable to the Department of Corrections. Enactment of Billed Party Preference would be detrimental to the inmates, their families and the Mississippi Department of Corrections.

Sincerely,


EDDIE M. LUCAS, Commissioner
Mississippi Department of Corrections

EML:JEMc:tr

cc: The Honorable James H. Quello
✓ The Honorable Andrew C. Barrett
The Honorable Rachelle B. Chong
The Honorable Susan Ness
Mississippi Public Service Commission

Honorable Reed E. Hundt
22 July 1994
Page -3-

cc: The Honorable Jamie L. Whitten
The Honorable Benny Thompson
The Honorable G. V. Montgomery
The Honorable Mike Parker
The Honorable Gene Taylor
The Honorable Thad Cochran
The Honorable Trent Lott
David Litchliter, Director, CDPA
file